

Attachment 3

NPS Recommended Changes (Red Text) to Air Quality Lease Notices

UT-LN-96

The lessee is given notice that the Bureau of Land Management (BLM) in coordination with the U.S. Environmental Protection Agency, **the National Park Service** and the Utah Department of Air Quality, among others, has developed the following air quality mitigation measures that may be applied to any development proposed on this lease. Integration of and adherence to these measures may help minimize adverse local or regional air quality impacts from oil and gas development (including but not limited to construction, drilling, and production) on regional ozone formation.

- All internal combustion equipment would be kept in good working order.
- Water or other approved dust suppressants would be used at construction sites, **well pads** and along roads, as determined appropriate by the Authorized Officer.
- Open burning of garbage or refuse would not occur at well sites or other facilities.
- Drill rigs would be equipped with Tier II or better diesel engines.
- Vent emissions from stock tanks and natural gas TEG dehydrators would be controlled by routing the emissions to a flare or similar control device which would reduce emissions by 95% or greater.
- Low bleed or no bleed pneumatics would be installed on separator dump valves and other controllers.
- During completion, flaring would be limited as much as possible. Production equipment and gathering lines would be installed as soon as possible **to limit flaring**.
- Well site telemetry would be utilized as feasible for production operations.
- Stationary internal combustion engine would comply with the following standards: 2g NOx/bhp-hr **or better** for engines <300HP; and 1g **or better** NOx/bhp-hr for engines >300HP.

Additional site-specific measures may also be employed to avoid or minimize effects to local or regional air quality. These additional measures will be developed and implemented in coordination with the U.S. Environmental Protection Agency, the Utah Department of Air Quality, **the National Park Service** and other agencies with expertise or jurisdiction as appropriate based on the size of the project and magnitude of emissions.

UT-LN-99

To mitigate any potential impact oil and gas development emissions may have on regional ozone formation **or cumulative AQRV impacts in protected areas such as national parks**, the following Best Management Practices (BMPs) would be required for any development projects:

- Tier II or better drilling rig engines
- Stationary internal combustion engine standard of **at least** 2g NOx/bhp-hr for engines <300HP and 1g NOx/bhp-hr for engines >300HP **or better**
- **Reduced flaring where feasible**
- Low bleed or no bleed pneumatic pump valves
- Dehydrator VOC emission controls to +95% efficiency
- Tank VOC emission controls to +95% efficiency

UT-LN-102

The lessee/operator is given notice that prior to project-specific approval, additional air quality analyses may be required to comply with the National Environmental Policy Act, Federal Land Policy Management Act, and/or other applicable laws and regulations. Analyses may include dispersion modeling and/or photochemical modeling for deposition and visibility **and other AQRV** impacts analysis, **additional** control equipment determinations, and/or emission inventory development. These analyses may result in the imposition of additional project-specific air quality control measures **to minimize contributions to ozone formation or protect AQRVs in nearby Class I and sensitive Class II areas.**